IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YOR

CONOPCO, INC. d/b/a UNILEVER

Plaintiff.

DATE MILEDIUN 2 6 2013

-against-

Case No.: 1:13-v-01838-GBD

INTERNATIONAL IP HOLDINGS, LLC

Defendant.

STIPULATION AND [PROPOSED] ORDER FOR FURTHER EXTENSION OF TIME TO OPPOSE MOTION TO DISMISS OR IN THE ALTERNATIVE TRANSFER VENUE

Plaintiff Conopco, Inc. d/b/a Unilever, by and through its undersigned counsel, and defendant International IP Holdings, LLC, by and through its undersigned counsel, do hereby stipulate to extend the time for Plaintiff to oppose Defendant's Motion to Dismiss or in the Alternative Transfer Venue from June 21, 2013 through and including July 22, 2013. This stipulated extension of time has been agreed upon by the parties. During this period, the parties have agreed that neither party will file any motions or responses to any motions in this action. This is the fourth extension of time requested for this matter. The requested extension will not affect any other scheduled dates in this case. This extension is not being entered for the purpose of delay, but for the purpose of allowing the parties additional time to continue their settlement discussions.

Gregory P. Gulia

Vanessa C. Hew

1540 Broadway New York, NY 10036

DUANE MORRIS LLP

212-692-1000 (Telephone)

212-692-1020 (Facsimile)

gpgulia@duanemorris.com (Email)

vchew@duanemorris.com (Email)

Dated: New York, New York June 19, 2013

Respectfully Submitted,

Adam J. Safer

MILLER & WRUBEL, P.C.

570 Lexington Avenue, 25th Floor

New York, NY 10022

212-336-3500 (Telephone)

212-336-3555 (Facsimile)

asafer@mw-law.com (Email)

and

Mark A. Cantor

BROOKS KUSHMAN P.C.

1000 Town Center

Southfield, MI 48075

248-358-4400 (Telephone)

248-358-3351 (Facsimile)

mcantor@brookskushman.com (Email)

JUN 26 2013

SO ORDERED.

Hon. George B. Daniels

United States District Court Judge

HON. GEORGE B. DANIELS